

UNITED STATES DISTRICT COURT DISTRICT OF GUAM

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JEANNE G. QUIMAT

UNITED STATES OF AMERICA,) Criminal Case No. 10-00053
Plaintiff,)))
v.)
DANILO T. AGUILAR,	Title 18, U.S.C. § 1956(a)(1)(B)(i)—Laundering of Monetary Instruments (Cts. 1 & 2).
Defendant.)
	<u></u>

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

Title 18, United States Code, Section 1956(a)(1)(B)(i)

LAUNDERING OF MONETARY INSTRUMENTS

On or about May 14, 2009, defendant Danilo T. AGUILAR, within the District of the Northern Mariana Islands and elsewhere, did conduct a financial transaction that affected interstate commerce, knowing that it involved property representing proceeds of an unlawful activity, and with the intent to conceal and disguise the location of those proceeds, to wit, by withdrawing the amount of ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) from the Defendant's account at the Saipan branch office of First Hawaiian Bank, knowing that said money represented the proceeds of mail fraud, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT TWO

Title 18, United States Code, Section 1956(a)(1)(B)(i) LAUNDERING OF MONETARY INSTRUMENTS

On or about May 15, 2009, defendant Danilo T. AGUILAR, within the District of the Northern Mariana Islands and elsewhere, did conduct a financial transaction that affected interstate commerce, knowing that it involved property representing proceeds of an unlawful activity, and with the intent to conceal and disguise the location of those proceeds, to wit, by withdrawing the amount of EIGHTY FOUR THOUSAND, NINE HUNDRED AND FORTY-SEVEN DOLLARS, AND FORTY-NINE CENTS (\$84,947.49) from the Defendant's account at the Saipan branch office of First Hawaiian Bank, knowing that said money represented the proceeds of mail fraud, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Dated this 3 day of September, 2010.

ALICIA A.G. LIMTIACO United States Attorney Districts of Guam and the NMI

By:

ERIC S. O'MALLEY

Assistant United States Attorney